

JOINT PETITION OF CENTRAL ILLINOIS PUBLIC
SERVICE COMPANY d/b/a AmerenCIPS and
ILLINOIS POWER COMPANY d/b/a AmerenIP,
FOR APPROVAL OF A ELECTRIC SUPPLIER
RELEASE AGREEMENT ALLOWING AmerenIP
TO SERVE A CUSTOMER IN AmerenCIPS'
SERVICE AREA.

DOCKET NO: 06-

0597

STIPULATED MOTION FOR A PAPER HEARING

NOW COME the parties, Central Illinois Public Service Company d/b/a AmerenCIPS ("AmerenCIPS"), and Illinois Power Company d/b/a AmerenIP ("AmerenIP") by Brown, Hay & Stephens, LLP and Richard S. Wolters, and hereby seek leave to conduct the above-captioned proceedings as a Paper Hearing pursuant to 83 Ill.Admin.Code §200.525. In support of this request, the parties state as follows:

1. The parties have filed a Joint Petition pursuant to Section 7-102 of the Public Utilities Act (220 ILCS 5/702) and to the extent necessary, pursuant to Section 6 of the Electric Supplier Act (220 ILCS 30/6).

2. Attached to the Petition is a true and correct copy of a Customer Request to Serve (marked for identification purposes as "Joint Petition Exhibit B") and a true and correct copy of an Electric Supplier Release Agreement (marked for identification purposes as "Joint Petition Exhibit A").

3. The Rules of Practice of the Illinois Commerce Commission permit the parties and Staff participating in a proceeding to stipulate to the waiver of a hearing and to the resolution of the matter based solely on the written pleadings and affidavits in a process described as a Paper Hearing (83 Ill.Admin.Code §200.525(a)). Such a stipulation may be filed at any time prior to the date the Administrative Law Judge marks the case Heard and Taken (83

Ill.Admin.Code §200.525(d)). The stipulation is subject to the approval of all parties, Staff and the Administrative Law Judge (83 Ill.Admin.Code §200.525(b)).

4. The parties agree that a Paper Hearing would be an efficient means of resolving the Joint Petition, as it appears there are no areas of controversy.


5. Attached hereto and marked for identification purposes as Joint Stipulation Exhibit A ("Stipulation"), is the Stipulation to be signed by the Staff member in the event one is assigned to this docket prior to the preparation of an order for the Illinois Commerce Commission's consideration. In the event no Staff member is assigned, both signatories to this Stipulation expressly waive the necessity of having Staff review this petition and/or file a Staff Stipulation.

6. An affidavit supporting the Stipulation and Exhibits is attached hereto and marked for identification as Joint Stipulation Exhibit B.

7. AmerenCIPS and AmerenIP have prepared a Draft Order, attached to this Joint Stipulation as Joint Stipulation Exhibit C.

WHEREFORE, the parties request that this proceeding be conducted as a Paper Hearing and that an Order substantially similar to the Draft Order attached to the Joint Petition as Joint Stipulation Exhibit C be entered.

**Central Illinois Public Service Company
d/b/a AmerenCIPS and Illinois Power Company
d/b/a AmerenIP**

By: 

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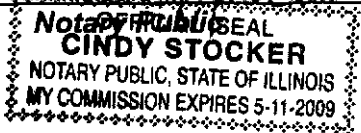
State of Illinois)
) SS.
County of Sangamon)

Verification

I, **Richard S. Wolters**, certify that (1) I am an attorney for Central Illinois Public Service Company d/b/a AmerenCIPS and Illinois Power Company d/b/a AmerenIP; (2) I have read the attached Stipulated Motion for a Paper Hearing; (3) I am familiar with the facts stated herein; and, (4) the facts are true and correct to the best of my knowledge.


Richard S. Wolters

Subscribed and sworn to before me this 31st day of August, 2006.

Joint Stipulation Exhibit "A"

STIPULATION

The Staff of the Illinois Commerce Commission (the "Staff") hereby stipulates to the attached Motion for a Paper Hearing ("Motion") pursuant to 83 Ill.Admin.Code §200.525.

Staff recommends that an Order substantially in the form of Joint Petition Exhibit "C" be entered in this proceeding.

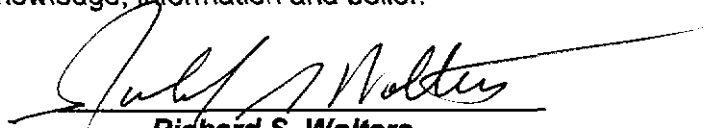
Assigned Staff Member:

Division
Illinois Commerce Commission


Dated this _____ day of _____, 2006.

Joint Stipulation Exhibit "B"

Richard S. Wolters, being duly first sworn, deposes and states that: (i) he is the Attorney for AmerenCIPS and AmerenIP; (ii) he sponsors the Joint Stipulation and Exhibits marked as Joint Stipulation Exhibits A, B and C; and, (iii) the information contained in such Exhibits are true and correct to the best of his knowledge, information and belief.


Richard S. Wolters

Subscribed and sworn to before me this 31st day of August, 2006.


OFFICIAL SEAL
CINDY STOCKER
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 5-11-2009

JOINT STIPULATION EXHIBIT C

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

**Central Illinois Public Service Company,
d/b/a AmerenCIPS and**

**Illinois Power Company,
d/b/a AmerenIP**

**JOINT PETITION OF CENTRAL ILLINOIS PUBLIC
SERVICE COMPANY d/b/a AmerenCIPS and
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DOCKET NO: 06- _____

DRAFT ORDER

By the Commission:

On August 31, 2006, Central Illinois Power Company d/b/a AmerenCIPS ("AmerenCIPS") and Illinois Power Company d/b/a AmerenIP ("AmerenIP") (collectively "Petitioners") filed a verified Joint Petition with the Illinois Commerce Commission ("Commission") seeking approval, pursuant to Section 7-102 of the Public Utilities Act ("Act") (220 ILCS 5/7-102) and, to the extent necessary, pursuant to Section 6 of the Electric Supplier Act (220 ILCS 30/6), of an Electric Supplier Release Agreement ("Agreement") between Petitioners that would allow AmerenIP to provide electric service to a customer in AmerenCIPS' service territory.

The Joint Petition states that the owner of Busy Bee Storage Facility II desires that electric service be provided to the storage facility at a location in Caseyville township of St. Clair County. The Joint Petition indicates that the storage facility has an address of 735 S. Main Street (also known as Illinois Route 157), Caseyville, Illinois. The Joint Petition states that while the location of the storage facility is in AmerenCIPS's service territory, AmerenIP has facilities

that are in a more convenient location to serve the storage facility. The Agreement allows AmerenIP to provide electric service to the storage facility. A letter from the owner of the storage facility to Petitioners indicating the owner's desire to have AmerenIP provide electric service to the storage facility was attached to the Joint Petition as Joint Exhibit B.

The Joint Petition asserts that the Agreement promotes the public interest and convenience since it allows for more suitable construction of electric utilities and more efficient provision of electric service to the storage facility.

The Commission, having considered the Joint Petition and Staff's response, is of the opinion and finds that:

(1) AmerenCIPS and AmerenIP are public utilities within the meaning of the Public Utilities Act and electric suppliers within the meaning of the Electric Supplier Act;

(2) the Commission has jurisdiction over Petitioners and the subject matter of this proceeding;

(3) the recitals of fact set forth in the prefatory portion of this order are supported by the record and are hereby adopted as findings of fact;

(4) approval of the Electric Supplier Release Agreement under Section 7-102 of the Public Utilities Act and Section 6 of the Electric Supplier Act may reasonably be granted, and the public will be inconvenienced thereby; and,

(5) AmerenIP should be permitted to provide electric service to the Busy Bee Storage Facility II at 735 S. Main Street, Caseyville, Illinois, as agreed to by AmerenIP and AmerenCIPS in the Electric Supplier Release Agreement.

IT IS THEREFORE ORDERED that the Electric Supplier Release Agreement between AmerenCIPS and AmerenIP, in the form of Joint Exhibit A to the Joint Petition, which allows AmerenIP to serve the Busy Bee Storage Facility II, is approved.

IT IS FURTHER ORDERED that subject to the provisions of 83 Ill. Adm. Code 00-880, this Order is not final; it is not subject to the Administrative Review Law.

By Order of the Commission this _____ day of _____, 2006.

CHARLIE E. BOX
Chairman

8/31/2006\crs\F:\WORD\SCHCLIEN\AMEREN\BUSY BEE\Order 3.doc